

UNITED STATES DISTRICT COURT

for the  
Eastern District of Virginia

United States of America

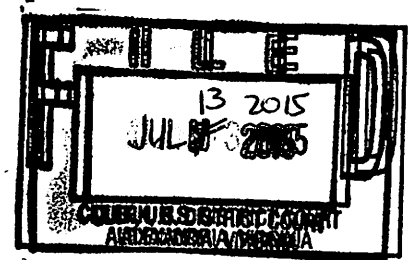
v.

Halil Falyali,  
Husnu Falyali, and  
Ozgur Demir

Defendant(s)

Case No. 1:15MJ371

UNDER SEAL



CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 2011 to the present in the county of N/A in the  
                     District of                     , the defendant(s) violated:

*Code Section*

*Offense Description*

18 United States Code, Section 1956 (h) Money Laundering Conspiracy

This criminal complaint is based on these facts:

the defendants knowingly and unlawfully conspired to transport, transmit, or transfer monetary instruments or funds from a place in the United States to or through a place outside of the United States, knowing that the funds involved in the transfer represented the proceeds of some form of unlawful activity and knowing that such transfer was designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity.

☒ Continued on the attached sheet.

Reviewed by AUSA/SAUSA:

Michael P. Ben'Ary

Timothy D. McGrath

Complainant's signature

Timothy D. McGrath, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

7/13/15

City and state:

Alexandria, VA

Michael S. Nachmanoff

United States Magistrate Judge

Judge's signature

The Honorable Michael S. Nachmanoff, United States  
Magistrate Judge

Printed name and title